

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)
Debtors. : (Jointly Administered)
----- X -----

**SUPPLEMENTAL AFFIDAVIT AND DECLARATION OF
LINDA D. WHITE ON BEHALF OF SNR DENTON US LLP**

STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

Linda D. White, being duly sworn, upon her oath, deposes and says:

1. I am a Partner of SNR Denton US LLP (the "Firm") located at 7800 Sears Tower, 2333 S. Wacker Drive, Chicago, IL 60606, and am duly authorized to make this affidavit and declaration (the "Supplemental Affidavit") on the Firm's behalf. I submit this Supplemental Affidavit in connection with the Debtors' retention of the Firm as special counsel pursuant to the Court's Order dated August 19, 2010 [Docket No. 10949].
2. This Supplemental Affidavit supplements my previous three affidavits, dated December 12, 2008 [Docket No. 2202], October 9, 2009 [Docket No. 5415], and August 3, 2010 [Docket No. 10632].
3. The primary purpose of this Supplemental Affidavit is to respond to concerns raised by the Office of the United States Trustee concerning the Firm's increase in hourly rates from 2010 to 2011.

4. The Firm's retention application, dated August 4, 2010 [Docket No. 10632] provided that the Firm's hourly rates may change from time to time in accordance with its established billing practices and procedures. The Firm's increase to its professional hourly rates in 2011 is in accordance with the Firm's commonplace practice of annually increasing its rates.
5. Rate adjustments from 2010 to 2011 have been very modest, with i) many professionals rates set at home office rates instead of New York office rates, ii) the Firm's current rates still below New York market rates, iii) the Firm's current rates still below the rates of other professionals retained by the Debtors, and iv) the rates being charged to the Debtors are in line with the rates the Firm charges clients in comparable non-bankruptcy matters.
6. Below please find the Firm's rates for its professionals (the "Professionals") who provided services to the Debtors in 2010 and the 2011 billing rates of the Professionals:

| NAME OF PROFESSIONAL PARTNERS AND OF COUNSEL: | YEAR ADMITTED | 2010 HOURLY RATE | 2011 HOURLY RATE |
|---|---------------|------------------|------------------|
| Carol Anne Been | 1983 | \$630.00 | \$650.00 |
| Roger T. Brice | 1973 | \$675.00 | \$695.00 |
| Stephen Cerniglia | 1996 | \$645.00 | † |
| Meghan Cocci | 1998 | \$665.00 | \$685.00 |
| Joseph A. Colagiovanni, Jr. | 1982 | \$690.00 | \$720.00 |
| A. James Cotins | 1990 | \$900.00 | \$925.00 |
| Mark W. Daliere | 1993 | \$655.00 | \$675.00 |
| Richard L. Fenton | 1978 | \$745.00 | \$765.00 |
| Robert L. Fernandez | 1999 | \$560.00 | \$590.00 |
| Jonathan D. Forstot | 1989 | \$760.00 | \$785.00 |
| Fruman Jacobson | 1973 | \$880.00 | \$915.00 |
| Alan S. Gilbert | 1975 | \$745.00 | \$765.00 |
| Erik D. Klingenberg | 1994 | \$900.00 | \$925.00 |
| Hugh M. McDonald | 1990 | \$805.00 | \$845.00 |
| Peter J. Mignone | 1997 | \$645.00 | \$665.00 |
| Jeffrey J. Murphy | 1984 | \$900.00 | \$925.00 |
| Barry B. Nekritz | 1962 | \$710.00 | \$730.00 |

| NAME OF PROFESSIONAL PARTNERS AND OF COUNSEL: | YEAR ADMITTED | 2010 HOURLY RATE | 2011 HOURLY RATE |
|---|---------------|------------------|------------------|
| Todd M. Stennes | 1992 | \$600.00 | \$650.00 |
| Frank P. VanderPloeg | 1973 | \$660.00 | \$680.00 |
| Linda D. White | 1976 | \$685.00 | \$705.00 |
| Mitchell G. Williams | 1985 | \$815.00 | \$840.00 |
| Douglass T. Wingo | 1994 | \$655.00 | \$685.00 |
| Marjorie J. Zessar | 1994 | \$600.00 | \$600.00 |

| NAME OF PROFESSIONAL ASSOCIATES: | YEAR ADMITTED | 2010 HOURLY RATE | 2011 HOURLY RATE |
|----------------------------------|---------------|------------------|------------------|
| Linda Bechutsky | 2009 | \$400.00 | \$455.00 |
| Michael M. Cunningham | 2008 | \$380.00 | \$470.00 |
| Michael A. Demetriou | 2006 | \$395.00 | \$395.00 |
| Matthew R. Diament | 2010 | \$315.00 | \$330.00 |
| Tyler Ellsworth | N/A | \$255.00 | † |
| George L. Espinal | 2001 | \$560.00 | † |
| Michael D. Flynn | 2009 | \$300.00 | \$310.00 |
| Rachel L. Goetz | 2003 | \$535.00 | \$550.00 |
| Jonathan S. Grebinar | 2004 | \$470.00 | \$550.00 |
| Steven Z. Haber | 2005 | \$470.00 | \$550.00 |
| Rachel D. Ittner | 2007 | \$350.00 | \$375.00 |
| Christopher H. Lee | 2007 | \$325.00 | \$340.00 |
| Keith H. Londo | 2004 | \$515.00 | \$525.00 |
| Matthew J. Lyons | 2003 | \$550.00 | \$610.00 |
| Brian J. Shortt | 2007 | \$505.00 | \$515.00 |
| Stephanie L. Wowchuk | 2007 | \$345.00 | \$385.00 |

| NAME OF PROFESSIONAL PARALEGALS, CLERKS, LIBRARY STAFF AND OTHER NON-LEGAL STAFF | 2010 HOURLY RATE | 2011 HOURLY RATE |
|--|------------------|------------------|
| Rita P. Barkachy | \$230.00 | \$235.00 |
| George L. Medina | \$275.00 | \$285.00 |
| Katharine L. Seidelman | \$210.00 | \$215.00 |

7. If necessary at a later date, the Firm will further supplement the information contained in this Supplemental Affidavit.

By: Linda D. White
Linda D. White

Subscribed and sworn to before me
this 14th day of April 2011

Margaret V. Carlson
Notary Public

